



February 18, 2008

VIA ELECTRONIC COMMENT FILING SYSTEM (ECFS)

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, DC 20554

RE: EB Docket No. 06-36 - CPNI Certification and Accompanying Statement

Dear Ms. Dortch:

On behalf of Cumby Telephone Cooperative, Inc. please find the attached annual CPNI certification and accompanying statement which is being filed pursuant to Commission Rule 64.2009(e).

Should you have any questions or need further information, please contact me at.

Sincerely,

A handwritten signature in black ink that reads "Jean Langkop" followed by a small "by DM" in the upper right corner of the signature.

Jean Langkop
Director - Regulatory Services
Authorized Representative of
Cumby Telephone Cooperative, Inc.

JL/DM/pjf

Attachments

cc: Enforcement Bureau, Telecommunications Consumers Division
(2 copies via U.S. mail)
Best Copy and Printing, Inc (via email FCC@BCPIWEB.COM)
Ms. Karen Zimmerman, Cumby Telephone Cooperative, Inc.
Mr. Rocky Byrd, Cumby Telephone Cooperative, Inc.

CPNI Certification for 2007
EB Docket No. 06-36

My name is Karen Zimmerman, and I am the General Manager of Cumby Telephone Cooperative, Inc. ("the Cooperative") of P. O. Box 619, 201 Frisco Street, Cumby, TX 75433. The Cooperative operates in the state of Texas under the name of Cumby Telephone Cooperative, Inc. as an incumbent local exchange carrier (ILEC) and a competitive local exchange carrier (CLEC). The officers and employees of the Cooperative are the same for the ILEC and CLEC. This certification is for both the ILEC and the CLEC. I have personal knowledge that the Cooperative has established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's ("FCC") customer proprietary network information ("CPNI") rules as set forth in Subpart U of Title 47 of the Code of Federal Regulations, Sections 64.2001 through 64.2011.

This certification is made pursuant to the requirements of the Federal Communications Commission ("FCC") under Section 64.2009(e) of the FCC rules. Attached to this certification is an accompanying statement explaining how the Cooperative's procedures ensure that the Cooperative is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

During the past year (2007) the Cooperative has taken no action (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers. During the past year the Cooperative has received no customer complaints concerning the unauthorized use, disclosure, or release of CPNI.


Signature

Karen Zimmerman
Printed name

General Manager
Title

Cumby Telephone Cooperative, Inc.
Name of Company

804990
Form 499 Filer ID

Date 02/14/08

ACCOMPANYING STATEMENT

To the best of my knowledge, Cumby Telephone Cooperative, Inc. ("the Cooperative") is in full compliance with the FCC rules on CPNI and its requirements for the safeguarding of such customer information. The Cooperative's operating procedures ensure that it is in compliance with the FCC's CPNI Rules because disclosure of, or permitting access to, our customers' CPNI is not allowed without obtaining the requisite customer approval, except as required by law, or the exceptions set forth in 47 U.S.C. §222, and Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R §64.2001 through §64.2011.

Appropriate safeguards on the disclosure of CPNI have been implemented in accordance with C.F. R. §64.2010. Although the Cooperative has not implemented passwords for authentication purposes, the Cooperative's operating procedures prohibit the release of call detail information over the telephone on a customer-initiated call unless the customer can provide specific details of the call necessary to address the customer service issue. If the customer cannot provide the relevant call detail information, the Cooperative only discloses call detail CPNI by calling the customer at the telephone number of record or mailing the information to the address of record.

CPNI is not released to a customer who visits the Cooperative's retail locations unless the customer can present a valid photo ID that matches the name on the customer account.

The Cooperative does not currently provide online account access to customers.

The Cooperative has procedures in place to notify a customer immediately when an address of record is created or changed.

The Cooperative has internal procedures in place to educate our employees about CPNI and the disclosure of CPNI. Employees with access to this information are aware of the FCC's rules and are prohibited from disclosing or permitting access to CPNI without the appropriate customer consent or as allowed by law and the FCC rules. Any employee that discloses CPNI is subject to disciplinary action, and possible termination.

Cooperative CPNI Status: To the best of my knowledge and belief, the Cooperative does not presently use, sell, or otherwise release CPNI for marketing or other commercial purposes. The Cooperative does not use, disclose or grant access to CPNI for any purpose, to any party or in any manner that would require a customer's "opt-in" or "opt-out" approval. If our customers' CPNI is to be used for sales and marketing campaigns in the future, the appropriate notice, approvals and safeguards will be implemented in accordance with Commission rules.